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March 2, 2021

Via ECF Only

Honorable Kimba M. Wood United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, N.Y. 10007

Re: U.S. v. Danibel Luis

Docket No.: 19-CR-00484 (KMW)

Your Honor:

This office represents Danibel Luis, the defendant in the above referenced matter which is scheduled for sentencing on March 23, 2021 at 2:00 p.m.

Mr. Luis' wife (co-defendant Oris Sanchez Olivo) is scheduled to surrender tomorrow at FIC Danbury. We write to respectfully request that Mr. Luis be permitted to travel outside of the Southern District of New York and Eastern District of New York so that he can drive his wife to the facility in Connecticut.

I have spoken with Pre-Trial officer Marlon Ovalles and he has no objections to this request. I have also spoken with AUSA Elizabeth Espinosa and she defers to pre-trial.

The Court's consideration of this request is respectfully appreciated. Thank you.

Yours truly,

John Russo

John L. Russo (JR6200) For Danibel Luis

SO ORDERED, N.Y., N.Y. 3 2 2

KIMBA M. WOOD

U.S.D.J.

Cc: Elizabeth A. Espinosa (Via E-Mail) Probation Officer Marlon Ovalles (Via E-Mail)